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June 5, 1992

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

Reference: NPRM in ET Docket No. 92-9  
Comments of MCI Telecommunications Corporation

Dear Ms. Searcy:

Transmitted herewith are an original and four copies of  
the comments of MCI Telecommunications Corporation in  
response to the Notice of Proposed Rulemaking in ET Docket  
No. 92-9.

If you have any questions or desire any further  
information, please contact me directly by telephone at  
(214) 918-4681 or facsimile at (214) 918-4536.

Respectfully submitted,  
MCI TELECOMMUNICATIONS CORPORATION

*David R. Mason 92c*

David R. Mason

Enclosures

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Before the  
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In the Matter of )  
 )  
Redevelopment of Spectrum to )  
Encourage Innovation in the ) ET Docket No. 92-9  
Use of New Telecommunications )  
Technologies )

COMMENTS

MCI Telecommunications Corporation ("MCI") hereby submits comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in ET Docket No. 92-9. The Commission proposes to establish new areas of the spectrum to be used for emerging telecommunications technologies. These new frequency bands would be designated from 220 MHz of the spectrum between 1.85 GHz and 2.20 GHz. This reallocation of spectrum will require the relocation of private and common carrier fixed microwave services currently occupying the 1.85-1.99 GHz, 2.11-2.15 GHz, and 2.16-2.20 GHz bands. The Commission proposes to make available all fixed microwave bands above 3 GHz, both the common carrier and the private bands, for reaccommodation of these existing 2 GHz fixed operations.

MCI currently operates approximately 275 fixed point-to-point microwave paths in the 4 GHz common carrier band, 225 paths in the 6 GHz band, and 100 paths in the 11 GHz band. Ongoing expansion of this fixed microwave service use through both frequency additions to existing paths and construction of new paths is an integral part of the overall MCI network development. Adequate frequency availability for fixed common carrier microwave paths is of great concern to MCI.

Part 94 of the FCC Rules and Regulations ("Rules") provides channelization plans for the fixed private microwave bands. Similar bandwidths share various band segments, i.e. very narrow and very wide emissions are not allocated to overlapping frequency ranges. Part 21 does not similarly provide channelization plans for the 4 GHz, 6 GHz, and 11 GHz fixed common carrier bands. The 18 GHz band is shared between private and common carrier users and both Part 21 and Part 94 contain channelization plans that match compatible bandwidths within various band segments. If sharing among different services and bandwidths is to be pursued, specific channelization plans should be added to the Rules to provide for orderly and spectrally efficient development. Otherwise, a few widely-spaced, narrow-bandwidth channels could preclude any wide-bandwidth channels within the same band segment.

The 18 GHz and 23 GHz bands are already shared between private and common carrier users. If the FCC is moving toward sharing all fixed microwave bands between private and common carrier users, then non-classified government operations and their frequency bands should be added to this sharing. With 140 MHz of spectrum being eliminated from that available for fixed microwave operations, more efficient use of the remaining frequency bands will be necessary. By providing access by each user group to a greater number of shared frequency bands, an optimum spectrum utilization could be achieved in all bands. Common technical standards and frequency coordination

procedures will need to be adopted by each licensing bureau.

The NPRM also discusses relocating fixed microwave paths to alternative media, specifically fiber optic circuits. While construction costs of fiber optic facilities have declined, there is still a channel capacity threshold below which fixed microwave is cost justifiable and fiber optics is not cost justifiable. Competitive market forces require proper choices for both initial implementations and technology conversions between microwave and fiber optics. The added incentive of a tax certificate, as proposed by the Commission, to convert microwave facilities to fiber optics should not be expected to overcome these differences in conversion and provide the necessary incentive in more than a limited number of cases. Ongoing operating costs will still dictate which technology is feasible.

MCI supports the Commission's intent to provide for the development of new telecommunications technologies. Equal concern for the support of existing fixed microwave services must be preserved during the process. Significant investments in these facilities have been justified under the current Rules which provide for expansion to meet capacity requirements.

Unrestricted relocation of microwave paths into higher frequency bands could result in poor spectrum utilization which clearly is not in the public interest. MCI submits that it is in the public interest to carefully plan and implement channelizations and band sharing arrangements.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By David R. Mason JLC  
David R. Mason  
400 International Parkway  
Richardson, Texas 75081

Dated: June 5, 1992

**CERTIFICATE OF SERVICE**

I, Girdie M. Kelly, do hereby certify that true copies of the foregoing "Comments of MCI Telecommunications Corporation" were hand delivered this 5th day of June, 1992 to the following parties:

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Girdie M. Kelly